

EXHIBIT A



WALLACE KING MARRARO & BRANSON, PLLC
 1050 THOMAS JEFFERSON STREET, N.W.
 WASHINGTON, DC 20007
 Phone 202.204.1000
 Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.
 Attention: Richard Senftleben
 7500 Grace Drive
 Columbia, MD 21044

Invoice #12652

For Professional Services Rendered in Connection with Honeywell, Inc. - Matter 6

Professional Services:

	<u>Hours</u>	
01/02/02 RLS	Review and identify relevant documents produced by Mueser Rutledge for Mr. Hughes.	3.40
TP	Review of undisputed facts related to costs, e-mail to Ms. Banks requesting supporting affidavit cited therein and review of affidavit retrieved (.5 hrs.); reviewed costs summary memo prepared by Ms. Flax and Excel spreadsheet of costs to determine the nature of costs for which Grace seeks to recover and when incurred (1.7 hrs.); Westlaw research and located law review articles related to NCP and necessary cost and began reaview of same for applicable case law (5.7 hrs.).	7.90
BB	Read, coordinate, organize and prepare new correspondence for incorporation into indexed case files (2.1 hrs.); research electronic case files and pleadings file for pertinent information re undisputed facts for Ms. Parker, collect and consult with Ms. Parker re same (.8 hrs); locate scanned memorandum re damages and email to Ms. Parker (.1 hrs.); consult with	3.20

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		<u>Hours</u>
	Ms. Kelly re preparation of trial exhibits list (.2 hrs.).	
01/02/02 MM	Review and incorporate all recently filed memorandums into files (.2 hrs.); continue to research project for Ms. Pelletier re Section F (i.e., contribution allocation factors) of the Chemical Waste Litigation Reporter (1.2 hrs.); case management (.7 hrs.).	2.10
01/03/02 BB	Continue list of relevant facts and information in 1992 deposition transcripts for Mr. Hughes (2.6 hrs.); continue cross-referencing entries on list of trial exhibits against exhibits, quality check documents and make corrections and changes as appropriate(2.9 hrs.).	5.50
AP	Research for motion to exclude experts.	6.00
MM	Finalize on-line research via Avis Lexis-Nexis re project assigned by Ms. Pelletier re producing various cases from Section F (i.e., contribution allocation factors of the chemical Waste Litigation Reporter, specifically dealing with percentage of liabilities, pending final compiling of data for Ms. Pelletier's review (2.6 hrs.).	2.60
TP	Continued review for Mr. Hughes of law review articles, including Westlaw research to obtain cited cases, reviewed cases and drafted summary of relevant language with citations.	7.80
01/04/02 RLS	Finish review of depositions from Allied related litigation (1.7 hrs.); draft memo for Mr. Hughes summarizing pertinent information recovered from the depositions (.3 hrs.); conduct review of Mueser Rutledge documents regarding heaving issue (1.7) hrs..	3.70
CHM	Review contract with company consultants and conference call with A. Nagy (.5 hrs.); conference with J. Agnello re amendment to bankruptcy court order. (.5 hrs.).	1.00

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	<u>Hours</u>	
01/04/02 BB	Continue cross-referencing trial exhibits list entries against trial exhibits, quality check documents and make corrections and changes as appropriate (2.1 hrs.); review, analyze, organize and prepare new correspondence and case documents and incorporate into indexed case files (1.9 hrs.); create Bates labels and label 11/29/01 Honeywell supplemental document production of Site reports, analytical data and emails re Study Area 6 and create new production file (.7 hrs.); incorporate interoffice research and issue analyses memos into electronic case files (.5 hrs.); prepare summary report of relevant site facts and testimony of Faranca 1992 deposition transcript for Mr. Hughes (2.9 hrs.); research electronic and case files for pertinent case agreements and email to attorney for Ms. Campbell (.4 hrs.).	8.50
TP	Continued research for Mr. Hughes to obtain cases related to NCP compliance, checked cases for any history and documenting any history related to NCP or New Jersey Spill Act issues.	3.10
MM	Review recent correspondence distributed by Ms. Kelley and Ms. Campbell (.4 hrs.); review, organize and compile all research and forward to Ms. Pelletier with memorandum for review (1.2 hrs.); case management (.6 hrs.).	2.20
01/05/02 BB	Continue cross-referencing designated trial exhibits against entries on exhibits list, quality check and make corrections and changes as appropriate for Mr. Hughes.	9.40
01/06/02 BB	Read, analyze and prepare summary index of deposition transcripts for Mr. Hughes.	7.20
01/07/02 AP	Designate deposition testimony (1.8 hrs.); research for motion to exclude Honeywell experts (2.0 hrs.).	3.80

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	<u>Hours</u>	
01/07/02 RLS	Finish review of and prepare Mueser Rutledge documents for Mr. Hughes' review (3.4 hrs.); draft memo for Mr. Hughes regarding information found (.3 hrs.).	3.70
BB	Preparation of summary index of deposition transcripts and quality check same for Mr. Hughes.	6.00
MM	Office conference with Ms. Pelletier re review of recent research projects and other matters relating to pretrial (.3 hrs.); preliminary preparation work (i.e., searching files for detailed information) re drafting deposition designations per Ms. Pelletier's request (1.1 hrs.); case management (.8 hrs.).	2.20
WH	Review letter and supporting documents from Mr. Caffrey re proposed allocation of costs for expert depositions (.8 hrs.); conferences with Mr. Caffrey and experts re allocation of expert deposition costs (1.4 hrs.); review expert invoices and related materials and confer with Ms. Banks re Honeywell's payment of Grace's deposition costs (1.1 hrs.); conference with Dr. Valera re billing issue and his review of selected materials re heaving problems at Baltimore site (.5 hrs.); review deposition transcripts and designate selected passages for use at trial (5.1 hrs.).	8.90
NAB	Download, print and review set of photographs of the North and South swales taken at our request re assessment of the North and South Swale issues for Mr. Hughes (1.1 hrs.); arrange for copies of same to be made for exhibit set (.3 hrs.); quality check copies of photos (.3 hrs.); organize and incorporate into case files (.6 hrs.); add copy to exhibit set (.2 hrs.).	2.50
TP	Began binder of case law re NCP and New Jersey Spill Act gathered to date with cite list.	1.40

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	<u>Hours</u>
01/08/02 CHM Respond to Lowenstein letter re Bankruptcy stay (1.2 hrs.); conference with expert witnesses re exhibits (1.4 hrs.).	2.50
TP Reviewed EPA-NCP guidance and summarized relevant portions related to removal and remedial actions under NCP.	2.10
AP Review correspondence (.5 hrs.); calls with Lowenstein re expert expenses (.3 hrs.); review CERCLA allocation cases (1.6 hrs.); motion to exclude Honeywell experts (4.0 hrs.).	6.40
WH Review SI Group invoice and confer with Mr. Golliday re PDM issue (.5 hrs.); calls to PDM re status of pilot study and documentation of same (.4 hrs.); review materials provided by Dr. Valera re test borings and related matters at Roosevelt Drive-In Site and confer with Dr. Valera re same (1.8 hrs.); work on cross-examination outline/materials and trial exhibits re geotechnical issue (6.1 hrs.).	8.80
BB Incorporate new correspondence into indexed Case files (1.2 hrs.); consult with Mr. Hughes on correspondence received from Lowenstein re payment of deposition costs and 1/7/01 email from case expert (.3 hrs.); research case files, collect and prepare pertinent correspondence re same (.2 hrs.); respond to 1/7/01 email from case expert (.2 hrs.); cross reference and analyze deposition invoices against response from defendant to our request for payment for Mr. Hughes (1.0 hrs.); prepare table of analysis of invoices for Mr. Hughes (1.7 hrs.)	4.60
RLS Office conference with Mr. Hughes regarding Mueser Rutledge document review (.3 hrs.); office conference with Ms. Banks regarding case database and other Muerser documents (.3 hrs.); conduct a review of and search for Muerser reports in the document database (1.9 hrs.).	2.50

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	<u>Hours</u>	
01/09/02 RLS	Conclude review of document database for Mueser documents (1.3 hrs.); compose memorandum for Mr. Hughes (.2 hrs.)	1.50
TP	Continued review of cases related to NCP compliance, summarized relevant portions, and checked cases for negative history to ensure they were still good law.	7.90
BB	Research Lexis and Thomas Internet service for news articles and text of congressional hearings on Brownfields legislation re innocent landowners for Mr. Hughes (1.9 hrs.); download, coordinate and prepare for Mr. Hughes and consult with Mr. Hughes re research results (.8 hrs.); research expert deposition transcripts and gather actual time spent in depositions (.9 hrs.); analyze invoices received from defendant for expert depositions, cross reference itemized billed amounts against actual deposition times and items billed and prepare table of analysis (2.4 hrs.); compute costs, update table and consult with Mr. Hughes re same (1.8 hrs.); follow up on issues re defendant's expert invoices and prepare email of same for Mr. Hughes (.8 hrs.); incorporate new correspondence into indexed case files (.7 hrs.)	9.30
AP	Motion to exclude Honeywell experts.	4.50
MM	Continue to review various documents (i.e., potential trial exhibits) received from Mr. Goad and revise chart reflecting details of stated documents (6.9 hrs.); case management (.7 hrs.).	7.60
WH	Analyze recent CERCLA amendments for possible applicability to CERCLA claims in the Honeywell case (1.3 hrs.); confer with Dr. Schmiermund re Parsons memoranda on heaving issue and review same (.8 hrs.); conferences with Dr. Chapman's office and Ms. Banks re billing matter (.4 hrs.); review Geomega invoice and confer with Dr. Davis'	8.60

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	<u>Hours</u>
staff re same and groundwater discharge issue (.8 hrs.); legal research re potential claim against PRP relating to interference with administrative process (3.0 hrs.); review materials collected by Ms. Banks re corporate reorganization and designate selected documents for use as trial exhibits (2.3 hrs.).	
01/09/02 CHM Work on pre-trial document -- revise stipulations and review Mutual documents re exhibits (7.5 hrs.); work with experts on discharge issues related to drainage (1.0 hrs.).	8.50
01/10/02 BB Continue incorporating new correspondence into indexed case files (.9 hrs.); consult with Ms. Parker and Mr. Hughes re resolution of issues surrounding defendant's expert deposition invoices (.5 hrs.); evaluate record of experts' invoices for information pertinent to response letter to defendant for Mr. Hughes and Ms. Parker (1.0 hrs.); revise analysis table and prepare email memo of results per Ms. Parker's specific requests (.7 hrs.); consult with Ms. Parker re same (.4 hrs.); assist Messrs. Marraro and Hughes in resolving issues re outstanding expert invoices (1.8 hrs.); continue cross referencing entries on list of trial exhibits against designated exhibits, make corrections as appropriate (2.3 hrs.).	7.60
MM Continue to analyze various documents (i.e., potential trial exhibits) received from Mr. Goad and revise chart reflecting details of stated documents (8.6 hrs.).	8.60
AP Review trial exhibit documents (2.0 hrs.); motion to exclude Honeywell experts (3.1 hrs.).	5.10
TP Office conference with Mr. Hughes re letter from Mr. Caffrey detailing expert deposition charges (.8 hrs.); emailed request to Ms. Banks for additional information on this issue in preparation for drafting responsive letter (.3 hrs.); reviewed materials gathered (including deposition transcripts to identify where experts	7.30

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	<u>Hours</u>
traveled from for deposition) and drafted letter questioning Honeywell's expert's time charges (4.3 hrs.); continued review of cases related to NCP compliance (1.2 hrs.); summarized relevant portions and checked cases for negative history to ensure they were still good law (.7 hrs.).	
01/10/02 WH Review materials produced by Honeywell re ecological risk assessment issues and designate selected documents re same for use at trial (2.8 hrs.); legal research re potential claim against PRP relating to interference with administrative process and confer with Mr. Marraro re same (2.8 hrs.); collect trial exhibits and work on database of trial exhibits and cross-examination materials (2.4 hrs.); review geotechnical documents collected by Mr. Smith and incorporate same into trial exhibits (1.3 hrs.).	9.30
RLS Review, organize and incorporate Mueser materials into the case file.	0.40
01/11/02 BB Incorporate new correspondence into indexed case files and create new files (.7 hrs.); review and quality check duplicates of trial exhibits (.5 hrs.); continue cross referencing designated trial exhibits against exhibits list and make corrections as appropriate (5.3 hrs.); continue preparation of deposition designations table for Mr. Hughes (.8 hrs.).	7.30
WH Review correspondence from Terris Pravlick re summary judgment motions and confer with Ms. Pelletier and Mr. Marraro re same (.5 hrs.); confer with Ms. Flax re requirements for trial brief and begin preparing same (3.6 hrs.); confer with paralegal re preparing chart depicting opinions to be expressed by Grace and Honeywell experts and direct/cross-examination points related to same (.5 hrs.); review documents collected by Grace	8.80

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		<u>Hours</u>
	expert re environmental issues at site and incorporate into trial exhibits (4.2 hrs.).	
01/11/02 MM	Continue to analyze various documents received from Mr. Goad and revise chart reflecting details of stated documents (7.1 hrs.).	7.10
TP	Continued review of cases related to NCP compliance including standard for determining when removal action is warranted and distinction between removal and remedial actions (3.8 hrs.); summarized relevant portions in draft memo analyzing NCP authority (3.1 hrs.); reviewed changes to draft letter e-mailed by Mr. Hughes (.2 hrs.); sent e-mail in response to his changes and to his voicemail explaining how Grace experts charged for deposition time and travel time and made revisions to letter in accordance with e-mail comments (.2 hrs.).	7.30
AP	Review trial exhibit documents (3.4 hrs.); motion to exclude Honeywell experts (2.6 hrs.).	6.00
01/14/02 WH	Confer with Ms. Parker re letter to Lowenstein on expert deposition issue (.3 hrs.); review and revise draft letter (.3 hrs.); confer with client re payment of expert deposition costs (.2 hrs.); review letter from Mr. Caffrey re Deming discovery issue and confer with Mr. Marraro same (.6 hrs.); legal research re Deming discovery issue (.8 hrs.); confer with paralegals re comparison of revised Mueser privilege log and Mueser documents produced by Honeywell and its contractors (.3 hrs.); review letter from Mr. Caffrey re stipulation on bankruptcy issue and related documents (.4 hrs.); review documents produced by Honeywell on risk assessment issues and incorporate into trial exhibits (4.4 hrs.); review deposition excerpts collected by Mr. Smith and incorporate into list of designations for use at trial (1.4 hrs.).	8.70

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	<u>Hours</u>	
01/14/02 MM	Continue to review various documents received from Mr. Goad and amend chart reflecting details of stated documents (4.9 hrs.); case management (.7 hrs.).	5.60
TP	Email with Mr. Hughes re status of letter re expert deposition fees (.3 hrs.); revised letter and sent letter after obtaining and confirming direct fax number for Mr. Caffrey (.8 hrs.); reviewed Ledbetter outline to identify additional cases on NCP and downloaded cases from Westlaw and analyze (2.5 hrs.); updated binder with research (.4 hrs.).	4.00
BB	Review and verify corrected copies of designated trial exhibits returned from Copy Center (.7 hrs.); incorporate same into collection of trial exhibits (.8 hrs.); check and verify same against exhibit descriptions on exhibits list and make corrections as appropriate (2.2 hrs.); update bankruptcy records and review docket on Pacer (.8 hrs.); verify, collect and email pertinent counsel information to Ms. Parker (.3 hrs.); review and incorporate new correspondence into indexed case files (.7 hrs.).	5.50
AP	Reserach and draft pre-trial motion re expert testimon.	5.80
01/15/02 WH	Review selected documents on environmental contamination issues at the site and designate for use as trial exhibits in support of Grace's RCRA claim (4.2 hrs.); collect and review pertinent trial exhibits re Honeywell's dilatory behavior in conducting site investigation and remediation (2.5 hrs.); review documents re human health issue for designation as trial exhibits and revise database entries re same (2.3 hrs.); confer with Dr. Goad and staff re risk assessment issue (.6 hrs.).	9.60
AP	Research and draft pre-trial motion.	6.50

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	<u>Hours</u>	
01/15/02 BB	Continue review of designated trial exhibits, quality check entries on exhibits list and make corrections and revisions as appropriate.	4.50
	Reviewed and summarized cases on NCP compliance and application of 1986 and 1990 versions.	4.30
	Finalize and review various documents received from Mr. Goad and revise chart reflecting details of stated documents for Mr. Hughes' review (3.9 hrs.); case management (.3 hrs.).	4.20
01/16/02 CHM	Work on pre-trial order (4.0 hrs.); meeting with plaintiffs re trial issues (2.2 hrs.).	6.20
	Prepare draft pre-trial motion.	4.70
	Review recent correspondence distributed by Ms. Campbell (.4 hrs.); finalize the compilation of documents received from Mr. Goad and put chart reflecting all documents in final and forward to Mr. Hughes with memorandum for review as well as via e-mail (2.8 hrs.); office conference with Mr. Hughes re completed project as well as further instructions to compare chart to current chart detailing all trial exhibits to assure they are present and perform preliminary compare and contrast of charts (.7 hrs.); case management (.3 hrs.).	4.20
TP	Reviewed Ledbetter outline for additional cases re necessary costs allowed in private cost recovery actions under CERCLA and obtained cases from Westlaw (2.0 hrs.); updated list of cases obtained to date (.4 hrs.); phone conference with Mr. Caffrey re expert fees and need to review invoices (.4 hrs.).	2.80
BB	Research NJDEP Internet site re whether NJDEP's categorized two Chemical Land Holdings Kerney Town Chromate contaminated sites as residential, download,	2.60

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	<u>Hours</u>	
	coordinate and prepare documents and create binders of same for Mr. Marraro (1.9 hrs.); consult with Mr. Marraro re research results (.1 hrs.); place telephone call to NJDEP re same for Mr. Marraro and provide results of call (.3 hrs.); review email received from expert and prepare and incorporate new document into electronic case files (.3 hrs.)	
01/16/02 WH	Review selected documents re Honeywell's interim remedial measures at the site and designate for use as trial (1.8 hrs.); review depositions and designate selected passages for use in challenging Honeywell's costs (1.4 hrs.); confer with Mr. Agnello re filing motion to compel production of Deming's documents and prepare letter re same (2.6 hrs.); collect and analyze documents to be used in support of Grace's claim against Honeywell under the license agreement (1.4 hrs.); review environmental documents collected by Mr. Moasser and incorporate same into trial exhibits (2.2 hrs.).	9.40
01/17/02 MM	Continue to compare and contrast trial exhibits charts per Mr. Hughes request (2.5 hrs.); case management (.2 hrs.).	2.70
AP	Prepare in limine motions.	6.00
BB	Continue review of designated trial exhibits, cross reference against document entries on the draft trial exhibits list, and make appropriate corrections and revisions.	3.10
01/18/02 CHM	Conference calls with client re CLH (.6 hrs.); prepare requests for admission (3.2 hrs.); work on stipulations (2.0 hrs.).	5.80
AP	Prepare in limine motions.	7.00
WH	Collect and analyze documents re relevant corporate acquisition/reorganization issues and incorporate same into trial exhibits (6.2 hrs.); review Judge Kavanaugh's orders denying	8.80

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	<u>Hours</u>
Honeywell's motion to supplement record and plaintiff's motion to amend and confer with Mr. Marraro re same (1.2 hrs.); confer with Ms. Pelletier re motion in limine (.2 hrs.); work on trial brief (1.2 hrs.).	
01/18/02 BB Research Westlaw and NJDEP web site for NJ Industrial Site Recovery Act 26B for Mr. Marraro (.8 hrs.); download,, coordinate and prepare binders of same (.1.7 hrs.); confer with Mr. Hughes re status of pre-trial preparation and best evidence rule re selected documents (.3 hrs.); research case index, collect and prepare pertinent documents for Mr. Hughes (.3 hrs.); review new case correspondence, prepare and incorporate into indexed case files (.1.1 hrs.); continue review, cross referencing designated trial exhibits against exhibits list and make corrections and revisions as appropriate (2.8 hrs.)	7.00
01/19/02 MM Continue to compare and contrast trial exhibits charts per Mr. Hughes request.	4.50
01/21/02 CHM Work on stipulations (5.5 hrs.); conference with experts re payments (1.0 hrs.).	6.50
01/22/02 BB Quality check table of analysis of cross referenced and identified duplicates in documents collected for trial exhibit review by case expert, compare to list of designated trial exhibits, make corrections and revisions as appropriate, and prepare verified documents for Mr. Hughes' review (8.8 hrs.); collect and prepare document for Ms. Pelletier (.2 hrs.); consult with Ms. Pelletier re trial exhibits preparation and arrangements for attorney review/designation (.3 hrs.); consult with Mr. Hughes by telephone re follow up and clarification of resolution of trial preparation issues (.3 hrs.); prepare deposition designations for Ms. Pelletier (.4 hrs.)	10.00

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	<u>Hours</u>	
01/22/02 AP	Conference with M. Moasser re cite-check brief (.3 hrs.); conference with B. Hughes re pre-trial preparation (.5 hrs.); conference with C. Marraro re Riverkeeper claims (.4 hrs.); compare and draft memo regarding Riverkeeper and ICO claims (1.9 hrs.); review correspondence relating to Chapman testimony and documents per B. Hughes (1.3 hrs.); designate deposition testimony for pre-trial submission (2.3 hrs.).	6.70
MM	Finalize comparison of my chart against Ms. Kelley's trial exhibit chart and produce all documents to Mr. Hughes via Ms. Banks for review (1.8 hrs.); forward e-mail to Mr. Hughes re same (.1 hrs.); office conference with Ms. Banks re same (.2 hrs.); office conferences with Ms. Pelletier re reviewing draft in limine motions and insert all requested information (.2 hrs.); search Westlaw, Federal Rules of Evidence and other resources re locating requested information to finalize brief (2.3 hrs.); forward revised brief to Ms. Pelletier for review (.1 hrs.); follow-up office conference with Ms. Pelletier re attempting to produce copy of Honeywell expert report and deposition transcript from Lockheed, et al., v. Crane, et al. (.2 hrs.); search Westlaw and Pacer re location of stated documents (.8 hrs.); telephone conferences with clerk of the court of the Federal District Court in Los Angeles and attorney Mary Morningstar at Lockheed re producing stated material (.4 hrs.).	6.10
CHM	Review Pelletier comparison of cross-claims in Riverkeeper and ICO case (.5 hrs.); conference with J. Agnello (.6 hrs.).	1.10
WH	Review and revise database entries re trial exhibits (1.6 hrs.); review deposition transcripts from Abeille-Paix case and designate relevant portions for use at trial (5.3 hrs.); work on cross-examination materials re	9.20

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	<u>Hours</u>
Honeywell's remediation and groundwater experts (2.3 hrs.).	
01/23/02 TP Emails with Mrs. Banks re question on Kanter invoice (.2 hrs.); drafted summary of Grace experts who did not charge travel time to Honeywell with locations from which they traveled and emailed to Mr. Caffrey (.9 hrs.); reviewed cases on NCP issue (.4 hrs.).	1.30
BB Review, assess and resolve issues re exhibits list and designated exhibits (3.0 hr.); quality check exhibits entries against designated exhibits and note corrections and revisions with Ms. Kelly (1.2 hr.); consult with Mr. Hughes re Mr. Wong's 1992 deposition summaries (.2 hrs.); provide guidance and assistance to Mr. Moasser re Mr. Wong's 2001 deposition summaries (.3 hrs.); research case and electronic indices, collect and prepare pertinent documents re PDM subpoena for Mr. Hughes (.4 hrs.); consult with Ms. Pelletier re same (.2 hrs.); consult with Mr. Hughes re resolution of trial exhibits issues and preparation for attorney review and analysis of designated exhibits (.4 hrs.); collect and prepare additional documents sent to Dr. Koch for Mr. Hughes (.3 hrs.); consult with Mr. Hughes re RI Report and UST closure documents for trial exhibits review (.3 hrs.); research case files and draft exhibits list re same and provide results to Mr. Hughes (.3 hrs.); continue review, assessment and resolution of issues re exhibits list and designated exhibits (.6 hrs.)	7.20
WH Review new Knight Piesold invoice and confer with Dr. Valera about status of assignments (.4 hrs.); confer with Ms. Pelletier re collecting cross-examination materials for use with NCP expert (.3 hrs.); work on cross-examination materials and trial exhibits re Honeywell's environmental experts (4.3 hrs.); review selected documents re acquisition of the site and designate for use as trial exhibits (2.6 hrs.);	8.60

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	<u>Hours</u>
	legal research re costs recovery issue under CERCLA (1.3 hrs.).
01/23/02 AP	Conference with B. Hughes re pre-trial and re Lockheed case (.4 hrs.); review trial exhibit documents and Parsons documents (3.0 hrs.); designate deposition testimony (1.5 hrs.).
MM	Review recent correspondence distributed by Ms. Campbell (.5 hrs.); office conference with Mr. Hughes re status of pending motions for summary judgment as well as preparing summaries of various depositions of James Wong (.4 hrs.); office conferences with Ms. Banks re same as well as other miscellaneous matters (.4 hrs.); follow-up telephone conferences with Federal District Court, Los Angeles and Ms. Morningstar of Lockheed re obtaining expert report and deposition transcript of Tod Delaney (i.e., Lockheed v. Crane) (.8 hrs.); follow-up search on Westlaw re same (.9 hrs.); office conference with Ms. Pelletier and Mr. Hughes re status of same (.2 hrs.); preliminary review and drafting of summaries of depositions of James Wong (4.3 hrs.).
01/24/02 BB	Collect and prepare NJDEP correspondence relied upon by Dr. Koch designated as trial exhibits (1.7 hrs.); research case and electronic files and analyze Honeywell/NJDEP correspondence re site ecological assessment issues for Mr. Hughes (2.1 hrs.); collect, prepare and consult with Mr. Hughes re results (.7 hrs.); QC designated trial exhibits nos. 297-320.
WH	Review documents for designation as trial exhibits and revise database entries re same (3.6 hrs.); review deposition transcripts and designate selected passages for use at trial (5.3 hrs.).

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	<u>Hours</u>
01/24/02 AP	Review and designate deposition testimony. 1.50
MM	Continue to review and draft summaries of James Wong various depositions taken by Mr. Marraro and Mr. Hughes (3.9 hrs.); office conference with Ms. Pelletier re forward e-mail to Mr. Marraro and Mr. Hughes re providing them with all information in regard to tracking down expert report and deposition in which expert testified on behalf of Lockheed Martin (.2 hrs.); forward all stated information as requested (.2 hrs.); office conference with Ms. Banks re status of pending deposition summaries (.2 hrs.); case management (.4 hrs.). 4.90
01/25/02 TP	Email with Mrs. Banks re expert costs and requested hourly rate of any expert that had not included travel time on deposition cost invoices (.2 hrs.); calculated based on estimated travel time and experts' hourly rate the amount of travel time due from Honeywell and emailed proposed amount to Mr. Caffrey (.3 hrs.). 0.50
CHM	Meeting with A. Nagy (3.5 hrs.); review court order re motion to strike (.3 hrs.); conference with client re same (.2 hrs.). 4.00
BB	Read, analyze and compile case file documents re Grace's acquisition of Daylin for Messrs. Marraro and Hughes (.9 hrs.); review newly designated trial exhibits, prepare and organize for entry on trial exhibits list (1.4 hrs.); research case files and GRA production CDs, collect and prepare documents to resolve issues re designated trial exhibits for Mr. Hughes (6.8 hrs.); collect and prepare pertinent document for Mr. Marraro (.4 hrs.). 9.50
WH	Review Grace experts' documents for designation as trial exhibits and revise database re same (6.4 hrs.); work on cross-examination and direct examination outlines and materials for trial (2.4 hrs.). 8.80

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	<u>Hours</u>	
01/25/02 MM	Continue to review and draft summaries of James Wong various depositions taken by Mr. Marraro and Mr. Hughes (3.1 hrs.); case management (.7 hrs.).	3.80
01/26/02 BB	Continue reading and analyzing corporate records re Grace's acquisition of Daylin and create chronology chart for Messrs. Marraro and Hughes.	4.50
01/27/02 BB	Continue reading and analyzing corporate records re Grace's acquisition of Daylin and prepare chronology chart for Messrs. Marraro and Hughes	0.80
01/28/02 TP	Phone conference with Mr. Caffrey negotiating expert deposition fees (.6 hrs.); drafted letter documenting agreement as he requested and emailed draft to Mr. Hughes (1.5 hrs.).	2.10
CHM	Site visit to review various issues and projects onsite; conference call with J. Agnello; call to Lowenstein.	3.50
MM	Continue to review and prepare brief summaries relating to James Wong (1.9 hrs.); office conference with Ms. Banks re status of same and other pending matters (.2 hrs.); office conference with Ms. Pelletier re cite checking brief in support of Grace's motion in limine to exclude testimony of Honeywell experts (.1 hrs.); telephone conference with Mr. Landry re obtaining counsel information as to who represented Crane, et al (.2 hrs.); search Westlaw re same (.4 hrs.); case management (.4 hrs.).	3.20
WH	Work on cross-examination materials for Honeywell's experts (4.8 hrs.); review and revise draft in limine motion from Ms. Pelletier (1.3 hrs.); confer with Ms. Parker re NCP compliance issue and collect evidence in support of same (1.8 hrs.); conferences with	8.70

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	<u>Hours</u>
	Ms. Banks and Mr. Mousser re status of assignments (.8 hrs.).
01/29/02 MM	Review correspondence distributed by Ms. Campbell (.2 hrs.); continue to review various depositions of James Wong and prepare brief summaries of same (3.3 hrs.); case management (.4 hrs.).
WH	Review record for relevant documents to be used in challenging Honeywell's costs (3.2 hrs.); conferences with Ms. Banks and Mr. Moassser re status of assignments (.6 hrs.); revise list of stipulated facts for pretrial order (.9 hrs.); collect/designate documents to be used at trial in support of Grace's response costs (3.7 hrs.).
CHM	All-day meeting at Carella Byrne re damage issues and other matters.
TP	Phone conference with Mr. Hughes re draft letter to Mr. Caffrey re costs for expert deposition (.2 hrs.); calculated amount due and revised letter (.6 hrs.).
01/30/02 MM	Continue reviewing and preparing brief deposition summaries of all James Wong's depositions taken by Mr. Marraro and Mr. Hughes (3.4 hrs.); follow-up telephone conferences with Mr. Landre re status of obtaining information pertaining to representing counsel of Crane in Lockheed v. Crane in 1996 (.6 hrs.); search Westlaw re same (.7 hrs.); review correspondence distributed by Ms. Campbell (.4 hrs.); case management (.8 hrs.).
WH	Confer with Mr. Caffrey re production of Valera document (.3 hrs.); prepare stipulation of counsel re production of Valera document and send to Mr. Caffrey (.8 hrs.); collect/designate trial exhibits regarding

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		<u>Hours</u>
	relevant corporate reorganization/acquisition issues (5.7 hrs.); work on trial brief (1.8 hrs.).	
01/30/02 CHM	Review expert deposition regarding motion to compel.	1.50
TP	Office conference and emails with Mr. Hughes and Mrs. Banks re name and addresses of Grace representatives to send check for expert costs (.4 hrs.); provided same to accounting office at Mr. Caffrey's request (.2 hrs.).	0.60
01/31/02 WH	Revise stipulation re discussions with Mr. Caffrey (.3 hrs.); review documents re human health issue for designation as trial exhibits and revise database entries re same (2.8 hrs.); confer with Dr. Goad's staff re trial prep issues and status of assignments (.8 hrs.); review and designate relevant DEP correspondence for use as trial exhibits (2.2 hrs.); review deposition transcripts re designations for pretrial order (3.1 hrs.).	9.20
MM	Continue to follow-up telephone conferences with Attorney Toohey at Paul Hastings' office in Los Angeles re obtaining firm who represented Crane in Lockheed v. Crane re obtaining copy of Dr. Delaney's expert report and deposition transcript for Ms. Pelletier (.3 hrs.); office conferences with Mr. Hughes and Ms. Banks re status of producing case documents relating to damages per Ms. Flax's 1/30/02 memorandum (.4 hrs.); follow-up telephone conference with Ms. Flax re same (.2 hrs.); continue to search case databases and other case filings re producing requested documents relating to damages per Ms. Flax's request (2.9 hrs.); continue to review and prepare brief summaries of James Wong deposition transcripts (2.5 hrs.); case management (.6 hrs.).	6.90

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	<u>Hours</u>	
01/31/02 TP	Phone conference with Mr. Hughes re privilege for consultant report when seeking costs (.3 hrs.); began Westlaw research re same (1.3 hrs.).	1.60
KK	Scan and OCR expert reports in preparation for Mr. Hughes' expert summary chart.	1.50
		<u>Amount</u>
Total Fees		587.60
01/31/2002 Less Deduction of 40% of Fees Per Agreement		\$141,582.00 (\$56,632.80)
Balance Due		<hr/> \$84,949.20

Timekeeper Summary

Name	Hours	Rate
Barbara Banks, Paralegal	134.70	135.00
Natasha A. Bynum, Legal Clerk	2.50	100.00
William Hughes, Counsel	151.30	350.00
Keith Kaider, Paralegal	1.50	135.00
Christopher H. Marraro, Partner	48.60	440.00
Mahmoude Moasser, Paralegal	96.10	135.00
Tamara Parker, Associate	62.80	270.00
Angela Pelletier, Associate	74.90	225.00
Reilly L. Smith, Paralegal	15.20	120.00

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Marraro
Branson



WALLACE KING MARRARO & BRANSON, PLLC
1050 THOMAS JEFFERSON STREET, N.W.
WASHINGTON, DC 20007
Phone 202.204.1000
Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.
Attention: William Corcoran
Vice President-Public & Regulatory Affairs
7500 Grace Drive
Columbia, MD 21044

Invoice #12655

For Professional Services Rendered in Connection with Libby, Montana - Matter 9

Professional Services:

		<u>Hours</u>
01/02/02	CHM Conference call with client and review articles from client.	0.80
01/08/02	CHM Review articles (.3 hrs.); conference call with B. Corcoran (.2 hrs.).	0.50
01/10/02	CHM Conference with B. Corcoran (.5 hrs.); conference with EPA and review asbestos articles (.7 hrs.).	1.20
01/11/02	CHM Conference call with EPA.	0.30
01/14/02	ACZ Discussions with C. Marraro regarding EPA's conflicting asbestos assessments at Libby and WTC site (.6 hrs.); research press coverage of same and calls to press contacts re same (1.0 hrs.).	1.60
CHM	Conference call with client (.5 hrs.); review Weiss memo and other documents (2.0 hrs.); review ATSDR write up (.7 hrs.); review Grace comments to Administrative record and draft summary (2.0 hrs.).	5.20

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		<u>Hours</u>
01/15/02	CHM Conference with P. Goad re Libby issues (.8 hrs.); prepare executive summary of comments (1.2 hrs.); meeting with A. Zacaroli re Libby project (.5 hrs.).	2.50
ACZ	Review Homes/Roberts documents from Libby related to asbestos assessments (.6 hrs.); conference with C. Marraro, P. Goad regarding same (.6 hrs.); telephone discussions with BNA about discrepancies in EPA treatment of WTC site and other sites (.6 hrs.).	1.80
01/17/02	CHM Review asbestos (.6 hrs.); conference with P. Goad re notes (.6 hrs.); review Weiss memo (1.0 hrs.); conference call with P. Goad re same (1.2 hrs.).	2.80
01/18/02	CHM Review articles (.5 hrs.); study P. Goad's analysis of study proposal (.7 hrs.); conference with clients (.2 hrs.).	1.40
ACZ	Review BNA story on WTC threats (.3 hrs.); follow-up calls to P. Najor, reporter with BNA (.4 hrs.).	0.70
01/23/02	ACZ Research/review latest press articles on WTC hazards.	0.30
	CHM Prepare for meeting with EPA (3.8 hrs.); meeting with EPA (2.0 hrs.).	5.80
01/24/02	CHM Conference call with B. Corcoran reporting on EPA meeting (1.0 hrs.); revise March draft report (.6 hrs.); conference with B. Corcoran re same (.4 hrs.); review articles re Libby (.4 hrs.).	2.40
01/25/02	CHM Follow-up call with EPA.	0.50
01/29/02	ACZ Review BNA article on recent EPA statements regarding WTC health risk (.2 hrs.); follow-up calls to BNA and Inside EPA regarding issues (.1 hrs.).	0.30

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	<u>Hours</u>	<u>Amount</u>
01/30/02 CHM Call with EPA (.5 hrs.); follow-up call with client (.2 hrs); conference with P. Goad (.3 hrs.).	1.00	
Total Fees	29.10	\$11,723.00
Balance Due		\$11,723.00

Timekeeper Summary

Name	Hours	Rate
Christopher H. Marraro, Partner	24.40	440.00
Alec C. Zaccaroli, Associate	4.70	210.00

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WALLACE KING MARRARO & BRANSON, PLLC
 1050 THOMAS JEFFERSON STREET, N.W.
 WASHINGTON, DC 20007
 Phone 202.204.1000
 Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.
 Attention: Akos L. Nagy
 7500 Grace Drive
 Columbia, MD 21044

Invoice #12653

For Professional Services Rendered in Connection with Preparation of Fee Application to
 Bankruptcy Court - Matter 10

Professional Services:

	<u>Hours</u>	<u>Amount</u>
01/02/02 CHM Prepare fee application.	2.10	
01/22/02 CHM Review second interim application.	1.20	
Total Fees	3.30	\$1,452.00
Balance Due		\$1,452.00

Timekeeper Summary

Name	Hours	Rate
Christopher H. Marraro, Partner	3.30	440.00

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WALLACE KING MARRARO & BRANSON, PLLC
 1050 THOMAS JEFFERSON STREET, N.W.
 WASHINGTON, DC 20007
 Phone 202.204.1000
 Fax 202.204.1001

February 21, 2002

W. R. Grace & Co.
 Attention: Richard Senftleben
 7500 Grace Drive
 Columbia, MD 21044

Invoice #12654

For Professional Services Rendered in Connection with General Matters - Matter 11

Professional Services:

	<u>Hours</u>
01/29/02 CHM Begin to prepare audit letter response.	1.00
01/30/02 CHM Work on audit letter.	1.50

	<u>Amount</u>
Total Fees	2.50 \$1,100.00
Balance Due	\$1,100.00

Timekeeper Summary

Name	Hours	Rate
Christopher H. Marraro, Partner	2.50	440.00